

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE	:	CHAPTER 13
ANDRES C PINEDO	:	
Debtor	:	CASE NO. 5-19-bk-02045-MJC
	:	
JACK N. ZAHAROPOULOS	:	
CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	MOTION TO DISMISS
	:	
ANDRES C PINEDO	:	
Respondent	:	

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, comes Debtor and responds to Trustee's Motion to Dismiss as Follows:

1. Admitted.
2. Admitted.
3. This averment is recitation of codified public law which requires no response, tot eht extent a response may be required the averment is denied.
4. Non Exempt proceeds were specifically accounted for in the Plan which the Honourable Judge Opel confirmed, at section B. 3.
5. There have been no non-exempt proceeds from potential personal injury/workman's compensation case to apply to payments.
6. Denied.
7. Denied that Trustee has established or will establish basis to dismiss the instant case
8. The Notice filed is a matter of public record to which no response is required.

Respectfully submitted,  
s/ Mark E. Moulton  
Mark E. Moulton,  
Attorney for Debtors  
Moulton & Moulton, PC  
693 RTE 739 STE #1  
Lords Valley, PA 18428

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**ORDER**

AND NOW, this       day of March 2025 upon consideration of the Trustee's Motion to Dismiss, the Debtor's response thereto and any hearing thereupon, the Trustee's Motion is hereby DISMISSED.

BY THE COURT

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CERTIFICATE OF SERVICE

I, Mark E. Moulton, Esquire, do hereby certify that a true and correct copy of the Debtor's Response to the Trustee's Motion to Dismiss and Proposed Order has been filed electronically, served the Movant and Respondents via PACER/ CM/ECF systems and they are available for viewing on-line.

Dated: March 12, 2025

/s/ Mark E. Moulton  
Mark E. Moulton